

# ACKNOWLEDGEMENT AND RECORD OF SPCC INSPECTION AND PLAN REVIEW OFFSHORE OIL DRILLING PRODUCTION OR WORKOVER FACILITIES

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY - REGION 6

1445 Ross Avenue, 6 SF-PO, Dallas, Texas 75202-2733

SPCC Case #: <u>FY-INSP-100128</u>		FRP ID: <u>FRP-06</u>	
SPCC Inspection Date: <u>4/8/10</u> Time: <u>1:00 PM</u>		FRP Inspection Date: _____ Time: _____	
Name of Facility: <u>Pecan Lake Field</u>			
Latitude: <u>29° 47' 59.9"</u> Longitude: <u>92° 42' 36.7"</u> Source: <u>SPCC Plan</u>			
Facility Address/Location: <u>29.799972 -92.719194</u> <u>Ocean Lake Superior Canal</u>			
<input type="checkbox"/> Tribal Land Reservation Name: _____			
City: <u>Kramer</u> County/Parish: <u>Cameron</u> State: <u>LA</u> Zip: _____			
Facility Contact: <u>Lance Melancon</u>		Title: <u>EHS Coordinator</u>	
Telephone Number: <u>985-860-7901</u>		Email: <u>lmelancon@hilcorp.com</u>	
Name of <input checked="" type="checkbox"/> Owner/ <input checked="" type="checkbox"/> Operator: <u>Hilcorp Energy Company</u>			
Address: <u>1201 Louisiana - Suite 1400</u>			
City: <u>Houston</u>		State: <u>TX</u> Zip: <u>77002</u>	
Contact: <u>713-209-2400</u>		Title: <u>EHS Manager</u>	
Telephone Number: <u>Henri Delaney</u>		Email: _____	
Synopsis of Business: <u>Oil/gas production</u>			
How many employees work at this facility? <u>~1</u>			NAICS #: <u>21111</u>
If unmanned, how many employees maintain this facility? _____			
Is the Facility: <input checked="" type="checkbox"/> Unattended <input type="checkbox"/> Attended ( <input type="checkbox"/> Daily (8 hr) <input type="checkbox"/> Daily (24 hr) <input checked="" type="checkbox"/> Periodically )			
Route of Entry to Waterway: <u>W. to Superior Canal and Pecan Lake</u>			
Distance to waterway (in feet): <u>~5</u>			
Relative direction to water body: <u>W</u>		Elevation above water body (ft): _____	
SPCC Inspector name: <u>Tom McKay</u>		FRP Inspector name: _____	
Team members: <u>Chris Perry</u>		Team members: _____	
SPCC Plan review by: <u>Tom McKay</u>		FRP review by: _____	
Date of review: <u>4/8/10</u>		Date of review: _____	

### Acknowledgement of Inspection

Company Contact: \_\_\_\_\_

Title: EHS Coordinator

Inspector: Tom McKay

Title: Inspector EPH/SEG

SPCC Insp. #: FY-INSP-

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Version 8, 11/03/2009

9689331

**Memorandum Of Understanding**  
(check all applicable descriptions)

<b>Non-Transportation Related</b> <input checked="" type="checkbox"/> EPA	<b>Transportation Related</b> <input type="checkbox"/> USCG <input type="checkbox"/> MMS <input type="checkbox"/> OPS
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**Facility Type**

<b>Onshore Oil:</b> <input type="checkbox"/> Production <input type="checkbox"/> Drilling/workover	<b>Offshore Oil:</b> <input checked="" type="checkbox"/> Drilling, Production and Workover
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☐ **Bulk Storage** (check all applicable descriptions)

<input type="checkbox"/> Aviation	<input type="checkbox"/> Federal Facility	<input type="checkbox"/> Petroleum Distributor	<input type="checkbox"/> Service Station
<input type="checkbox"/> Animal Fats & Oils	<input type="checkbox"/> Gathering Facility	<input type="checkbox"/> Petroleum Marketing Terminal	<input type="checkbox"/> Transporter (Truck/Rail)
<input type="checkbox"/> Asphalt Paving	<input type="checkbox"/> Hospital	<input type="checkbox"/> Pipeline Bulk Storage	<input type="checkbox"/> Tribal
<input type="checkbox"/> Asphalt Coatings	<input type="checkbox"/> Manufacturing, Lube/Grease	<input type="checkbox"/> Railroad	<input type="checkbox"/> Utilities
<input type="checkbox"/> Auto Dealership	<input type="checkbox"/> Marina	<input type="checkbox"/> Remediation/Recycling	<input type="checkbox"/> State
<input type="checkbox"/> Bulk Packing	<input type="checkbox"/> Military	<input type="checkbox"/> Refinery	<input type="checkbox"/> Local
<input type="checkbox"/> Concrete/Cement	<input type="checkbox"/> Mining	<input type="checkbox"/> Rental Car Company	<input type="checkbox"/> Other: _____
<input type="checkbox"/> Crude Petroleum	<input type="checkbox"/> Natural Gas Liquids	<input type="checkbox"/> Sand & Gravel facility	
<input type="checkbox"/> Farm	<input type="checkbox"/> Petrochemical	<input type="checkbox"/> School/University	

**Applicable Storage Containers**

(check all applicable descriptions)

<input checked="" type="checkbox"/> Aboveground Storage Tanks  <input type="checkbox"/> Mobile/portable storage Units	<input type="checkbox"/> Underground Storage Tanks  <input type="checkbox"/> Surface impoundments	<input checked="" type="checkbox"/> Drums  <input type="checkbox"/> Lagoons	<input checked="" type="checkbox"/> In-plant piping  <input type="checkbox"/> Equipment	<input type="checkbox"/> Other containers _____ _____
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**Storage Function**

(check all applicable descriptions)

<input checked="" type="checkbox"/> Transferring	<input type="checkbox"/> Distributing	<input checked="" type="checkbox"/> Processing	<input checked="" type="checkbox"/> Gathering	<input type="checkbox"/> Consuming/Using	<input type="checkbox"/> Operations
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**Facility Storage Capacities**

AST Storage Capacity (gal): <u>201,264</u>	UST Storage Capacity (gal): <u>N/A</u>	Total Facility Capacity (gal): <u>201,264</u>
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Types of Oil Stored:

<input checked="" type="checkbox"/> Crude oil	<input type="checkbox"/> Gasoline	<input type="checkbox"/> Diesel	<input type="checkbox"/> Fuel oil	<input type="checkbox"/> Jet fuel	<input type="checkbox"/> Vegetable oil/animal fats, grease
<input checked="" type="checkbox"/> Other: <u>oil/water</u>					

<b>Qualified Facility Thresholds:</b> <input checked="" type="checkbox"/> <u>&lt; 5,000 Gallons</u>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
The aggregate aboveground storage capacity is 10,000 Gallons or less 112.3(g)(1) <b>AND</b>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
The facility has had no single discharge exceeding 1,000 U. S. gallons, and the facility has had no two discharges exceeding 42 U.S. gallons within any twelve-month period in the three years prior to the SPCC Plan self-certification date, or since becoming subject to the rule if the facility has been in operation for less than three years. (Note: Oil discharges that result from natural disasters, acts of war, or terrorism are not included in this qualification determination.) 112.3(g)(2)	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
Is the facility considered a Qualified Facility? If YES to both questions above, <b>AND</b> the owner/operator has self certified the SPCC Plan, then check YES and complete Appendix A	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

**GENERAL APPLICABILITY - 40 CFR 112.1**

Does the facility maintain an aggregate aboveground oil storage capacity of over 1,320 gallons, and/or completely buried oil storage capacity of over 42,000 gallons? ☒ YES ☐ NO

and

Is the facility engaged in drilling, producing, gathering, storing, processing, refining, transferring, distributing, using, or consuming oil and oil products, which due to its location could reasonably be expected to discharge oil into or upon the navigable waters of the United States (as defined in 40 CFR 110.1)? ☐ YES ☒ NO

If YES to both, the facility is regulated under 40 CFR 112.

**Note: The following storage capacity is not considered in determining applicability of SPCC requirements:**

- Completely buried tanks subject to all the technical requirements of 40 CFR 280 or a state program approved under 40 CFR 281.
- Equipment subject to the authority of the U.S. Department of Transportation, U.S. Department of the Interior, or Minerals Management Service, as defined in Memoranda of Understanding dated November 24, 1971, and November 8, 1993.
- Any facility or part thereof used exclusively for wastewater treatment and not used to satisfy SPCC requirements.
- Containers smaller than 55 gallons.
- Permanently closed containers.

**FACILITY RESPONSE PLAN (FRP) APPLICABILITY**

Does the facility transfer oil over water to or from vessels and has a total oil storage capacity greater than or equal to 42,000 gallons? ☒ YES ☐ NO

Or,  
Does the facility have a total oil storage capacity of at least 1 million gallons,

And,

at least one of the following is true:

The facility does not have secondary containment sufficiently large enough to contain the capacity of the largest aboveground tank plus sufficient freeboard for precipitation. ☐ YES ☒ NO

The facility is located at a distance such that a discharge could cause injury to fish and wildlife and sensitive environments. ☒ YES ☐ NO

The facility is located such that a discharge would shut down a public drinking water intake. ☐ YES ☒ NO

The facility has had a reportable discharge greater than or equal to 10,000 gallons in the past 5 years. ☐ YES ☒ NO

If YES to any of the above, the facility is a non-transportation related onshore facility required to prepare and implement a FRP as outlined in 40 CFR 112.20.

Does the facility maintain a FRP? ☒ YES ☐ NO ☐ Not Required

FRP Number: FRP-06-

Does the Plan include a signed copy of the Certification of the Applicability of the Substantial Harm Criteria per 40 CFR Part 112.20(e)? Attachment C-II ☐ YES ☒ NO

Comment:

Sub/Harm criteria not correct in plan

**REQUIREMENTS FOR PREPARATION AND IMPLEMENTATION OF A SPCC Plan - 40 CFR 112.3**

Facility Startup Date:

~ 1960

Date of initial SPCC Plan preparation:

N/A

Current Plan version (date/number):

11/8/07

For facilities (excluding farms) in operation prior to August 16, 2002, was the Plan amended and implemented by November 10, 2010? 112.3(a) ☒ YES ☐ NO ☐ N/A

For facilities (excluding farms) beginning operation between August 17, 2002 and November 10, 2010, is the Plan prepared and fully implemented by November 10, 2010? 112.3(a) ☐ YES ☐ NO ☒ N/A

For facilities beginning operation after November 10, 2010, was the Plan implemented before beginning operations? 112.3(b) & (c) ☐ YES ☐ NO ☒ N/A

Is an SPCC Plan prepared? ☒ YES ☐ NO ☐ N/A

Professional Engineer certification must include statements that the PE attests to. 112.3(d)

He/she is familiar with the requirements of the SPCC rule. (i) ☒ YES ☐ NO ☐ N/A

He/she or his/her agent has visited and examined the facility. (ii) ☒ YES ☐ NO ☐ N/A

The Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards, and with the requirements of the SPCC rule. (iii) ☒ YES ☐ NO ☐ N/A

Procedures for required inspections and testing have been established. (iv) ☐ YES ☐ NO ☒ N/A

The Plan is adequate for the facility. (v) ☐ YES ☐ NO ☒ N/A

Is the SPCC Plan fully PE certified? 112.3(d) ☒ YES ☐ NO Date of Certification: 11/8/07

Name of Professional Engineer: Barny J. Hebert

License Number: 25395

State: LA

Is an SPCC Plan available for review? ☒ YES ☐ NO  
(During normal working hours) 112.3(e)(2)

Is an SPCC Plan maintained on site? ☒ YES ☐ NO  
(For at least 4 hours/day, excluding oil production facilities) 112.3(e)(1)

**AMENDMENT OF SPCC PLAN BY REGIONAL ADMINISTRATOR (RA) - 40 CFR 112.4**

Have there been reportable spills at this facility of more than 1,000 gallons? 112.4(a) ☐ YES ☒ NO ☐ N/A

Or, has the facility had two spills of more than 42 gallons in the past 12 months? 112.4(a) ☐ YES ☒ NO ☐ N/A

If YES to either, was information submitted to the RA as required in §112.4(a)? ☐ YES ☐ NO ☒ N/A

Date of spills: \_\_\_\_\_

If applicable, have changes required by the RA been implemented in the Plan and/or facility? 112.4(d). (e)

☐ YES ☐ NO ☒ N/A

Comment:

# AMENDMENT OF SPCC PLAN BY THE OWNER OR OPERATOR—40 CFR 112.5

1/8/10

Has there been any change of facility design (construction, operation, or maintenance) that could affect the facility's potential for discharge? (112.5a) ☒ YES ☒ NO ☐ N/A

If YES, was the amendment within 6 months and was a plan change ☐ Yes ☐ No or a design change ☐ Yes ☐ No

(2) 1000 bbl ASTs replaced w/ 500 & 400 bbl ASTs and plan not updated and re-certified by P.G.

Is the SPCC Plan reviewed and evaluated every 5 years? ☒ YES ☐ NO ☐ N/A

If amended and implemented (if necessary), is it documented in the Plan (sign off sheet)? 112.5(b) ☐ YES ☐ NO ☐ N/A

Date of latest change: \_\_\_\_\_ Certification #: \_\_\_\_\_

Name of PE certifying amendments 112.5(c) (Except for self certified Plans): \_\_\_\_\_

License #: \_\_\_\_\_ State: \_\_\_\_\_ Date of Certification: \_\_\_\_\_

Reason for amendment: \_\_\_\_\_

Comment: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

## GENERAL REQUIREMENTS FOR SPCC PLANS 112.7(a-d)

	Adequately Addressed in Plan	
Does the SPCC Plan indicate (by signature and date) that management has approved the plan? 112.7 Mgmt Personnel Name: <u>Henri de launay</u> Mgmt Personnel Title: <u>ELDS mgr</u>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	
Does the Plan format follow the sequence in the rule? 112.7 or If no, is a cross-reference provided? <del>Does the Plan call for additional facilities or procedures, methods, or equipment not yet fully operational?</del> If yes, are the following items discussed in the Plan? <input type="checkbox"/> Installation <input type="checkbox"/> Start-up	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A <input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A <input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A	
Does the Plan include a discussion of conformance with SPCC requirements? 112.7(a)(1)	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	
Does the Plan deviate from SPCC requirements? 112.7(a)(2) If yes, does the plan provide: Written documentation validating/explaining rational for non-conformance with the SPCC requirements? and Written documentation outlining/detailing the alternative method/how it achieves environmental equivalence?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A <input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A <input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A	

Does the Plan contain a facility diagram? 112.7(a)(3)	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
Does the diagram include:		
The location and contents of each container? and	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
Completely buried storage tanks? and	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
Transfer stations? and	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
Connecting pipes?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
Is there a description in the Plan of the physical layout of the facility and includes: 112.7(a)(3)	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
- The type of oil in each container and its storage capacity? 112.7(a)(3)(i)	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
- Discharge prevention measures including procedures for routine handling of products? 112.7(a)(3)(ii)	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
- Discharge or drainage controls, such as secondary containment around containers, and other structures, equipment, and procedures for the control of a discharge? 112.7(a)(3)(iii)	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Countermeasures for discharge discovery, response, and cleanup (including facility and contractor resources)? 112.7(a)(3)(iv)	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
Methods for disposal of recovered materials in accordance with applicable legal requirements? 112.7(a)(3)(v)	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A	
Contact list and phone numbers for the facility response coordinator, NRC, cleanup contractors, and federal, state, and local agencies who must be notified in the case of a discharge as described in § 112.1(b)? 112.7(a)(3)(vi)	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A	
Does the Plan include information and procedures for reporting a discharge (exact location, phone number, date/time of material discharged, quantity, actions taken, evacuations, notifications, (names/organizations etc.)? 112.7(a)(4)	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	
Does the Plan include procedures to use when a discharge may occur? 112.7(a)(5)	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	
Does the Plan include a prediction and description of major equipment failure(s) that could result in a discharge from the facility per 40 CFR 112.7(b)? <input type="checkbox"/> direction, <input type="checkbox"/> rate of flow, and <input checked="" type="checkbox"/> total quantity of oil	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	
Does the Plan discuss appropriate containment and/or diversionary structures/equipment (dikes, berms, retaining walls, curbing, culverts, gutters/drain systems, weirs, boom, diversion/retention ponds, sorbent material) and is sufficiently impervious to contain oil. per 40 CFR 112.7(c)	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Has it been determined in the Plan, that the installation of structures or equipment (containment) is not practicable? 112.7(d) If YES, check <input type="checkbox"/> then 40 CFR Part 109 Checklist must be filled out and,	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A	
- Is the impracticability clearly demonstrated?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A	
- For bulk storage containers, is periodic integrity testing of containers and leak testing of the valves and piping associated with the container conducted?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
- Is a strong contingency plan per 40 CFR 109 provided? 112.7(d)(1)	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A	
- Is a written commitment of manpower, equipment, and material (to control and remove any quantity of oil discharged) provided in the SPCC plan? 112.7(d)(2)	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A	

Comment: (2) 1000 bbl tanks replaced w/ 500 & 400 bbl tanks and plan not amended & rec-certified

INSPECTIONS, TESTS, AND RECORDS 112.7(e)	Adequately Addressed in Plan	Adequately Addressed in Field
Are inspections and tests required by 40 CFR 112 conducted in accordance with written procedures developed for the facility? 112.7(e)	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
If Yes, are written procedures, records of inspections and/or customary business records:		
- Signed by the appropriate supervisor or inspector?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
- Kept with the SPCC Plan?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
- Maintained for a period of three (3) years?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> N/A
Comment: Plan calls for daily visual observations & annual written inspection reports; Forms provided but not completed by operator		

PERSONNEL TRAINING AND DISCHARGE PREVENTION PROCEDURES 112.7(f)	Plan Review	Field Verification
Are oil handling personnel trained on: 112.7(f)(1)		
- The operation and maintenance of equipment to prevent the discharge of oil?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
- Discharge procedure protocols (discovery and notification)?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
- Applicable pollution control laws, rules, and regulations?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
- General facility operations?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
- The contents of the Plan?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Is there a designated person accountable for spill prevention? 112.7(f)(2)	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Name and title of individual? <u>Ricky Canik</u>		
Are spill prevention briefings scheduled periodically? 112.7(f)(3)	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	<input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
What is the schedule (minimum at least once a year)?		
<input type="checkbox"/> Monthly <input type="checkbox"/> Quarterly <input type="checkbox"/> Semi-annually <input checked="" type="checkbox"/> Annual		

Comment:

Does the Plan include a risk analysis and/or evaluation of field constructed aboveground tanks for brittle fracture after tank repair/alteration or when a change in service has occurred? 112.7(i)

☐ YES ☐ NO ☒ N/A

☐ YES ☐ NO ☒ N/A

Comment

Does the Plan include a discussion of conformance with applicable requirements of the SPCC rule or any applicable state rules, regulations, and guidelines and other effective discharge prevention and containment procedures listed in 40 CFR Part 112? 112.7(j)

☐ YES ☐ NO ☒ N/A

☐ YES ☐ NO ☒ N/A

Comment

**QUALIFIED OIL-FILLED OPERATIONAL EQUIPMENT SECONDARY CONTAINMENT OPTION 112.7(k)**

**Adequately Addressed In Plan**

**Adequately Addressed In Field**

Is there qualified oil-filled operational equipment at the facility? (Oil storage containers and associated piping intrinsic to the operation of the equipment in which the oil is present solely to support the function of the apparatus or the device.) If YES,

☐ YES ☐ NO ☒ N/A

☐ YES ☐ NO ☒ N/A

Has the facility had a single reportable discharge as described in §112.1(b) from any oil-filled operational equipment exceeding 1,000 U.S. gallons occurred within any 12-month period within the three years prior to Plan certification date?, and/or,

☐ YES ☐ NO ☒ N/A

☐ YES ☐ NO ☒ N/A

Has the facility had two reportable discharges as described in §112.1(b) from any oil-filled operational equipment each exceeding 42 U.S. gallons occurred within any 12-month period within the three years prior to Plan certification date?, if NO to both,

☐ YES ☐ NO ☒ N/A

☐ YES ☐ NO ☒ N/A

-Has the facility met the criteria for the secondary containment option?

☐ YES ☐ NO ☒ N/A

☐ YES ☐ NO ☒ N/A

If YES for either, secondary containment is required. See 112.7(c).

☐ YES ☐ NO ☒ N/A

☐ YES ☐ NO ☒ N/A

If NO and no secondary containment is provided, then:

- Are facility procedures for inspections/monitoring program established and documented? 112.7(k) (2)(i)

☐ YES ☐ NO ☒ N/A

☐ YES ☐ NO ☒ N/A



- Does the facility maintain a Facility Response Plan? 112.7(k) (2)(ii), <b>OR</b>	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
- Is there a Contingency plan following 40 CFR part 109 (see Appendix C checklist) is provided? <b>AND</b>	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
- Is there a written commitment of manpower, equipment, and materials required to control and remove any quantity of oil discharged that may be harmful?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
Comment ----- ----- ----- ----- -----		

OFFSHORE OIL DRILLING PRODUCTION OR WORKOVER FACILITIES 112.7 (11) (See Container Inspection Forms)	Adequately Addressed in Plan	Adequately Addressed in Field
<b>Environmental Equivalence</b> <input type="checkbox"/> (If environmental equivalence declared by PE, complete Appendix D of this checklist)		
Is oil drainage collection equipment, to prevent and control small oil discharges, around pumps, glands, valves, flanges, expansion joints, hoses, drain lines, separators, treaters, tanks, and associated equipment utilized? 112.11(b) EE <input type="checkbox"/>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Are drains controlled/directed to a central collection sump, or is oil removed from collection equipment as often as necessary to prevent an overflow? EE <input type="checkbox"/>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
If there is a sump system, is it adequately sized? 112.11(c) EE <input type="checkbox"/>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Is there a spare pump or equivalent method available (redundant automatic sump pumps and control devices)? EE <input type="checkbox"/>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Is there a regularly scheduled preventative maintenance inspection and testing program to ensure reliable operations of the liquid removal system and pump start-up device? EE <input type="checkbox"/>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Are separators and treaters equipped with dump valves? 112.11(d) If yes, EE <input type="checkbox"/>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
- Is the flare line extended to a diked area if the separator is near shore? 112.11(d)(1) EE <input type="checkbox"/>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
- Is the separator equipped with a high liquid level sensor that will automatically shut in the wells? 112.11(d)(2) EE <input type="checkbox"/>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
- Is there a parallel redundant dump valve installed? 112.11(d)(2) EE <input type="checkbox"/>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Are atmospheric storage/surge containers equipped with high level sensing devices that activate an alarm or control flow; and prevent discharges? 112.11(e) EE <input type="checkbox"/>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A

Are pressure containers equipped with high and low pressure sensing devices that activate an alarm or control flow? 112.11(f) EE <input type="checkbox"/>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Are containers equipped with suitable corrosion protection? 112.11(g) EE <input type="checkbox"/>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Are written procedures for inspecting and testing pollution prevention equipment and systems prepared? 112.11(h) If YES, EE <input type="checkbox"/>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
- Are written procedures maintained at the Facility? EE <input type="checkbox"/>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
- Are written procedures included in the SPCC Plan? EE <input type="checkbox"/>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Is testing and inspection of pollution prevention equipment and systems (commensurate with the complexity, conditions, and circumstances of the facility and any other applicable regulations) conducted periodically? 112.11(i) EE <input type="checkbox"/>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
At what frequency?		
- Daily, or (Visuals)	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
- Weekly, or	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
- Monthly, or	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
- Annual, or (Quarterly)	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
- Other?	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
Are simulated discharges used for testing and inspecting human and equipment pollution control and countermeasure systems? EE <input type="checkbox"/>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Are surface and subsurface well shut-in valves and devices sufficiently described? 112.11(j) EE <input type="checkbox"/>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Are detailed records for each well maintained? EE <input type="checkbox"/>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Is there a blowout prevention (BOP) assembly installed and well control system utilized before drilling below casing strings or during workovers, and capable of controlling well-head pressure? 112.11(k) EE <input type="checkbox"/>	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
Are manifolds (headers) equipped with check valves on individual flowlines? 112.11(l) EE <input type="checkbox"/>	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
Are flowlines equipped with high pressure sensing device and shut-in valve at the wellhead? 112.11(m) EE <input type="checkbox"/>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
- If NO, is a pressure relief system provided? EE <input type="checkbox"/>	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A
Are all piping appurtenant to the facility corrosion protected (protective coatings or cathodic protection)? 112.11(n) EE <input type="checkbox"/>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Is sub-marine piping protected against environmental stress and other operations such as fishing operations? 112.11(o) EE <input type="checkbox"/>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A
Are sub-marine piping inspected and tested periodically? 112.11(p) EE <input type="checkbox"/>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A

At what frequency?

- Daily, or (visuals)
- Weekly, or
- Monthly, or
- Annual, or (corrosion)
- Other?

☒ YES ☐ NO ☐ N/A

☐ YES ☐ NO ☒ N/A

☐ YES ☐ NO ☒ N/A

☒ YES ☐ NO ☐ N/A

☐ YES ☐ NO ☒ N/A

☒ YES ☐ NO ☐ N/A

☐ YES ☐ NO ☒ N/A

☐ YES ☐ NO ☒ N/A

☒ YES ☐ NO ☐ N/A

☐ YES ☐ NO ☒ N/A

Are records of inspections and tests documented and maintained?

EE ☐

☒ YES ☐ NO ☐ N/A

☒ YES ☐ NO ☐ N/A

Comment:

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# Qualified Facilities Checklist

## Appendix A: Qualified Facility Plan Requirements

Complete this Appendix only if the facility is a "qualified facility" as defined in §112.3(g). A qualified facility's Plan, whether certified by a PE or self-certified, must comply with all of the applicable requirements of §112.7 and subparts B and C of 40 CFR Part 112 referenced earlier in this checklist.

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112.6 Qualified Facility Plan Requirements	Yes	No	N/A
(a) Did the owner/operator of the qualified facility self-certify the SPCC Plan? <i>If NO, see requirements for 112.3(d) above. If YES, did the owner/operator certify in the Plan that:</i>			<input checked="" type="checkbox"/>
(1) He or she is familiar with the requirements of 40 CFR part 112.			<input checked="" type="checkbox"/>
(2) He or she has visited and examined the facility.			<input checked="" type="checkbox"/>
(3) The Plan has been prepared in accordance with accepted and sound industry practices and standards.			<input checked="" type="checkbox"/>
(4) Procedures for required inspections and testing have been established.			<input checked="" type="checkbox"/>
(5) The Plan is being fully implemented.			<input checked="" type="checkbox"/>
(6) The facility meets the qualification criteria set forth under §112.3 (g).			<input checked="" type="checkbox"/>
(7) The Plan does not deviate from any requirements as allowed by §112.7(a)(2) and 112.7(d), except as described under §112.6(c).			<input checked="" type="checkbox"/>
(8) Management has given full approval of the Plan and necessary resources have been committed for the Plan's full implementation.			<input checked="" type="checkbox"/>
(b) Did the owner/operator self-certify any of the Plan's technical amendments?			<input checked="" type="checkbox"/>
If YES: Is the certification of any technical amendments in accordance with the provisions above (§112.6(a))?			<input checked="" type="checkbox"/>
(c)(1) and (d)(1) Environmental Equivalence. For each alternative measure allowed under §112.7(a)(2), the Plan is accompanied by a written statement by a PE that states the reason for nonconformance and describes the alternative method and how it provides equivalent environmental protection in accordance with §112.7(a)(2).			<input checked="" type="checkbox"/>
(c)(2) and (d)(1) Impracticability. For each determination of impracticability of secondary containment pursuant to §112.7(d), the Plan clearly explains why secondary containment measures are not practicable at this facility and provides the alternative measures required in §112.7(d) in lieu of secondary containment.			<input checked="" type="checkbox"/>
(c)(3) Security. The Plan contains one of the following: (i) The Plan complies with requirements under §112.7(g), <b>OR</b> (ii) The Plan complies with the requirements under §112.6(c)(3)(ii): Plan describes how the owner/operator secures and controls access to the oil handling, processing and storage areas; secures master flow and drain valves; prevents unauthorized access to starter controls on oil pumps; secures out-of-service and loading/unloading connections of oil pipelines; addresses the appropriateness of security lighting to both prevent acts of vandalism and assist in the discovery of oil discharges.			<input checked="" type="checkbox"/>
(c)(4) Bulk Storage Containers. The Plan contains one of the following: (i) The Plan complies with the requirements under §§112.8(c)(6) or 112.12(c)(6), as applicable; <b>OR</b> (ii) The Plan complies with the requirements under §112.6(c)(4)(ii): • Aboveground containers, supports and foundations tested for integrity on a regular schedule and whenever repairs are made. • Appropriate qualifications for personnel performing tests and inspections have been determined in accordance with industry standards. • The frequency and type of testing and inspections have been determined in accordance with industry standards, taking into account container size, configuration and design. • Container supports and foundations regularly inspected • Outside of containers frequently inspected for signs of deterioration, discharges, or accumulation of oil inside diked areas			<input checked="" type="checkbox"/>

• Records of inspections and tests maintained				✓
(d) Did a PE certify a portion of a qualified facility's self-certified Plan? If <b>YES</b> , the PE must certify in the Plan that:				✓
(d)(2) (i) He/she is familiar with the requirements of 40 CFR Part 112. (ii) He/she or a representative agent has visited and examined the facility. (iii) The alternative method of environmental equivalence in accordance with §112.7(a)(2) or the determination of impracticability and alternative measures in accordance with §112.7(d) is consistent with good engineering practice, including consideration of applicable industry standards, and with the requirements of 40 CFR Part 112.				✓
(b)(1) If a PE certified a portion of the Plan, did a PE certify any technical amendments that affect this portion of the Plan?				✓
Comments:				

## Appendix B: Container Inspection Form

Container ID: #12595  
oil stock

SPCC Inspection #: FY-INSP-100128

Maximum capacity (gal): 540661

Container height (ft): 25

Nominal capacity (gal): 540661

Container diameter (ft): 12

Year Built: 1997

Current Status: ☒ Active ☐ Standby ☐ Out of service ☐ Closed

**Material(s) Stored in Container:**

☒ Crude oil ☐ Gasoline ☐ Diesel ☐ Fuel oil ☐ Jet fuel ☐ Vegetable oil/animal fats, grease

Other: \_\_\_\_\_

**Container Type:**

☒ Vertical Cylindrical ☐ External Floating Roof ☐ Geodesic Dome  
☐ Fixed Roof (Vented) ☐ Internal Floating Roof ☐ Spheroid  
☐ Coned Roof - (Vented) ☐ Hemispheroid (Noded) ☐ Horizontal Cylindrical  
☐ Coned Roof - (Not Vented) ☐ Hemispheroid (Not Noded) Other: \_\_\_\_\_

**Container Material:**

☒ Single Wall Steel ☐ Not Painted ☐ Wooden  
☐ Double Wall Steel ☐ Fiberglass Reinforced Plastic Other: \_\_\_\_\_  
☒ Painted ☐ Composite (steel with fiberglass)

**Container Construction:**

☒ Welded ☐ Riveted ☐ Bolted ☒ Shop Fabricated ☐ Field Erected

**Container Cathodic Protection:**

☒ None ☐ Sacrificial Anode(s) ☐ Impressed Current

**Inspect container including the base for leaks, specifically looking for:**

**Drips, weeps, & stains:**

☐ Check if present and check if:  
 Acceptable ☐  
 Or, if Unacceptable ☐  
☒ Adequate

**Discoloration of tank:**

☐ Check if present and check if:  
 Acceptable ☐  
 Or, if Unacceptable ☐  
☒ Adequate

**Corrosion:**

☐ Check if present and check if:  
 Acceptable ☐  
 Or, if Unacceptable ☐  
☒ Adequate

Comment on container inspection: \_\_\_\_\_

**Container Foundation Material:**

☐ Earthen Material ☐ Ring Wall ☐ Concrete (w/impermeable mat.) ☐ Concrete (w/o impermeable mat.)

☐ Steel ☐ Unknown Other: wood planks on concrete

**Inspect container foundation, specifically looking for:**

**Cracks:**

☐ Check if present and check if:  
 Acceptable ☐  
 Or, if Unacceptable ☐  
☒ Adequate

**Settling:**

☐ Check if present and check if:  
 Acceptable ☐  
 Or, if Unacceptable ☐  
☒ Adequate

**Gaps (between tank and foundation):**

☐ Check if present and check if:  
 Acceptable ☐  
 Or, if Unacceptable ☐  
☒ Adequate

Comment on foundation inspection: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

**Container Piping Construction:**

☒ Aboveground      ☐ Underground      ☐ Steel (bare)      ☒ Steel (painted)      ☐ Steel (galvanized)  
☐ Double walled      ☐ Copper      ☐ Fiberglass reinforced plastic      ☐ Unknown  
 Other: \_\_\_\_\_

**Inspect pipes/valves, specifically looking for:**

<b>Leaks at joints, seams, valves:</b> <input type="checkbox"/> Check if present and if: Acceptable <input type="checkbox"/> Or, if Unacceptable <input type="checkbox"/> <input checked="" type="checkbox"/> Adequate	<b>Discoloration:</b> <input type="checkbox"/> Check if present and if: Acceptable <input type="checkbox"/> Or, if Unacceptable <input type="checkbox"/> <input checked="" type="checkbox"/> Adequate	<b>Corrosion:</b> <input type="checkbox"/> Check if present and if: Acceptable <input type="checkbox"/> Or, if Unacceptable <input type="checkbox"/> <input checked="" type="checkbox"/> Adequate
<b>Bowing of pipe:</b> <input type="checkbox"/> Check if present and if: Acceptable <input type="checkbox"/> Or, if Unacceptable <input type="checkbox"/> <input checked="" type="checkbox"/> Adequate	<b>Pooling of stored material:</b> <input type="checkbox"/> Check if present and if: Acceptable <input type="checkbox"/> Or, if Unacceptable <input type="checkbox"/> <input checked="" type="checkbox"/> Adequate	

Comment on piping/valve inspection: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

**Secondary Containment Types:**

☐ Dikes/berms/retaining walls      ☒ Curbing      ☐ Culverts and/or gutters      ☐ Spill diversion ponds  
    *→ sump pump.*  
☐ Sorbent Materials      ☐ Retention Ponds      ☐ Weirs and/or booms  
 Other - Loc.: \_\_\_\_\_

**Secondary Containment Checklist:**

<input type="checkbox"/> Capacity does not appear to be adequate?	<input type="checkbox"/> Drainage mechanism manually operated?
<input type="checkbox"/> Not sufficiently impervious to stored material?	<input type="checkbox"/> Presence of stored material within dike or berm?
<input type="checkbox"/> Standing water within dike or berm?	<input type="checkbox"/> Debris/vegetation within or on the dike or berm area?
<input type="checkbox"/> Erosion or corrosion of dike or berm?	

Location: \_\_\_\_\_

Comment on containment inspection: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

# SPCC CONTINGENCY PLAN REVIEW CHECKLIST

## Appendix C: 40 CFR Part 109—Criteria for State, Local and Regional Oil Removal Contingency Plans

n/A

If a facility makes an impracticability determination for secondary containment in accordance with §112.7(d), it is required to provide an oil spill contingency plan following 40 CFR, part 109. Items below must be addressed in the Plan and implemented at the facility.

SPCC Inspection #: FY-INSP- 100128

109.5—Development and implementation criteria for State, local and regional oil removal contingency plans	Yes	No
(a) Definition of the authorities, responsibilities and duties of all persons, organizations or agencies which are to be involved in planning or directing oil removal operations.	<input type="checkbox"/>	<input type="checkbox"/>
(b) Establishment of notification procedures for the purpose of early detection and timely notification of an oil discharge including:	<input type="checkbox"/>	<input type="checkbox"/>
(1) The identification of critical water use areas to facilitate the reporting of and response to oil discharges.	<input type="checkbox"/>	<input type="checkbox"/>
(2) A current list of names, telephone numbers and addresses of the responsible persons (with alternates) and organizations to be notified when an oil discharge is discovered.	<input type="checkbox"/>	<input type="checkbox"/>
(3) Provisions for access to a reliable communications system for timely notification of an oil discharge, and the capability of interconnection with the communications systems established under related oil removal contingency plans, particularly State and National plans (e.g., NCP).	<input type="checkbox"/>	<input type="checkbox"/>
(4) An established, prearranged procedure for requesting assistance during a major disaster or when the situation exceeds the response capability of the State, local or regional authority.	<input type="checkbox"/>	<input type="checkbox"/>
(c) Provisions to assure that full resource capability is known and can be committed during an oil discharge situation including:	<input type="checkbox"/>	<input type="checkbox"/>
(1) The identification and inventory of applicable equipment, materials and supplies which are available locally and regionally.	<input type="checkbox"/>	<input type="checkbox"/>
(2) An estimate of the equipment, materials and supplies which would be required to remove the maximum oil discharge to be anticipated.	<input type="checkbox"/>	<input type="checkbox"/>
(3) Development of agreements and arrangements in advance of an oil discharge for the acquisition of equipment, materials and supplies to be used in responding to such a discharge.	<input type="checkbox"/>	<input type="checkbox"/>
(d) Provisions for well defined and specific actions to be taken after discovery and notification of an oil discharge including:	<input type="checkbox"/>	<input type="checkbox"/>
(1) Specification of an oil discharge response operating team consisting of trained, prepared and available operating personnel.	<input type="checkbox"/>	<input type="checkbox"/>
(2) Pre-designation of a properly qualified oil discharge response coordinator who is charged with the responsibility and delegated commensurate authority for directing and coordinating response operations and who knows how to request assistance from Federal authorities operating under existing national and regional contingency plans.	<input type="checkbox"/>	<input type="checkbox"/>
(3) A preplanned location for an oil discharge response operations center and a reliable communications system for directing the coordinated overall response operations.	<input type="checkbox"/>	<input type="checkbox"/>
(4) Provisions for varying degrees of response effort depending on the severity of the oil discharge.	<input type="checkbox"/>	<input type="checkbox"/>
(5) Specification of the order of priority in which the various water uses are to be protected where more than one water use may be adversely affected as a result of an oil discharge and where response operations may not be adequate to protect all uses.	<input type="checkbox"/>	<input type="checkbox"/>
(e) Specific and well defined procedures to facilitate recovery of damages and enforcement measures as provided for by State and local statutes and ordinances.	<input type="checkbox"/>	<input type="checkbox"/>



## Environmental Equivalence (EE) Checklist

### Appendix D: Environmental Equivalence Requirements

*n/18*

Complete this Appendix only if the facility has declared "environmental equivalence" measures as described in § 112.7(a)(2). Facility owners and operators have the flexibility to deviate from specific rule provisions if the Plan states the reason for nonconformance and if equivalent environmental protection is provided by some other means of SPCC. EE declarations must be certified by a PE. For EE declarations, see portions of checklist referenced earlier.

SPCC Citation:		SPCC Inspection #: <i>FY-INSP- 100128</i>	
Is there written documentation validating/explaining rational for non-conformance with the SPCC requirements?		<input type="checkbox"/> YES <input type="checkbox"/> NO	
Is there written documentation outlining/detailing how the alternative method achieves environmental equivalence? <b>and,</b>		<input type="checkbox"/> YES <input type="checkbox"/> NO	
Is the alternative method:			
Technically feasible?		<input type="checkbox"/> YES <input type="checkbox"/> NO	
Logistically sound?		<input type="checkbox"/> YES <input type="checkbox"/> NO	
Practicable?		<input type="checkbox"/> YES <input type="checkbox"/> NO	
Name of Professional Engineer: _____			
License Number: _____		State: _____	
Other PE certification requirements:			
Did a PE certify a portion of a qualified facility's self-certified Plan? <input type="checkbox"/> YES <input type="checkbox"/> NO			
Description of environmental equivalence:			
Inspector Comment:			

\* Use additional Appendix D forms for multiple Environmental Equivalent declarations.